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December 15, 2016

BY ECF

The Honorable Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re:    *United States v. Percoco, et al., 16 Cr. 776 (VEC)***

Dear Judge Caproni:

We represent Louis Ciminelli in the above-referenced matter. At Mr. Ciminelli's initial appearance in the Southern District of New York, the parties agreed to bail conditions for Mr. Ciminelli. Among other conditions, the parties agreed that Mr. Ciminelli's travel would be restricted to the states of New York, California, and Arizona (and points in between as necessary to travel back and forth). However, there was a clerical error made when Mr. Ciminelli's written bond was prepared. The bond states that his travel should be limited to the Southern and Eastern Districts of New York, as well as the states of California and Arizona. Mr. Ciminelli's primary residence and place of business are located in the Western District of New York. The Pretrial Services Office has requested that we seek a written clarification of the travel restrictions. Accordingly, we hereby request that the Court order that Mr. Ciminelli be permitted to travel to the states of New York, California, and Arizona (and points in between as necessary to travel back and forth). The Government and the Pretrial Services Office each consent to this request.

Respectfully submitted,

**DLA Piper LLP (US)**  
  
Jessica A. Masella  
Partner

JAM

cc:    Natasha Ramasar  
United States Pretrial Services Officer

Janis Echenberg/Robert Boone  
Assistant United States Attorneys